February 13, 2014

Ken Alex, Director Governor's Office of Planning and Research 1400 10th Street Sacramento, California 95812-3044

RE: Support for Vehicle Miles Traveled Metric for Transportation Analysis

Dear Ken,

We support Vehicle Miles Traveled (VMT) as the most suitable metric for evaluating potential traffic issues under CEQA. As your evaluation points out, VMT is straightforward to analyze, captures the effects of regional location, and indirectly accounts for the benefits of active transportation and transit projects. Importantly, VMT's inclusion in CEQA would align project-level decisions with the state's larger planning framework, notably SB 375, and with regional policies and investment priorities embedded in the RTP/SCS.

This VMT metric will allow cities like Oakland to develop their own robust approach to building out its bikeway network and make transit and walking improvements as well, all of which will give a tremendous boost to lessening transportation impacts on the environment, and make us all healthier to boot.

We recommend that the new metric should be applied statewide, not just in TPAs. Having two separate methods for TPAs and non-TPAs will be burdensome and confusing for lead agencies, project applicants and community stakeholders. A single, uniform set of thresholds will simplify the CEQA process. Oakland is currently waiting to fully study traffic delay on streets such as Telegraph Avenue, Park Blvd and 14th St. Oakland should not have to wait. Park Blvd is also a great example of a street extending just outside Oakland's Priority Development Areas, but which desperately needs safety improvements. CEQA reform is needed to keep kids walking and bicycling to school safe.

Thank you for your support of our concerns on this most important issue.

Sincerely,

Advocacy Director

East Bay Bicycle Coalition

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